

FILED  
Clerk  
District Court

DEC 28 2005

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For The Northern Mariana Islands  
By \_\_\_\_\_  
(Deputy Clerk)

Attorney for Saipan Handicraft.

**IN THE UNITED STATES DISTRICT COURT  
FOR THE  
NORTHERN MARIANA ISLANDS**

SAIPAN HANDICRAFT,	)	Civil Action No. 05-0040
	)	
Plaintiff,	)	<b>MOTION FOR PRELIMINARY</b>
vs.	)	<b>INJUNCTION and for</b>
	)	<b>EXPEDITED HEARING</b>
MICRONESIAN WOODCRAFT ENT.,	)	
INC.; TIRZO J. ADRIATICO,	)	
individually and as President of	)	Date: JAN - 6 2006
Micronesian Woodcraft Ent., Inc.;	)	Time: <u>10:00 a.m.</u>
and JOHN DOES 1-40,	)	Judge: Honorable Alex R. Munson
	)	
Defendants.	)	
_____	)	

**Motion for Injunction**

1. Pursuant to Rule 65 of the Federal Rules of Civil Procedure, Plaintiff Saipan Handicraft ("Handicraft"), hereby respectfully moves this Court for an order enjoining and restraining Defendants, during the pendency of this action, from making, marketing, distributing and advertising, among other things, any local handicraft dolls that use or contain the trademark "Bo Jo Bo Wishing Doll" or "Legend of the Bo Jo Bo Wishing Doll" or that infringe on the trade-dress of the Handicraft Bo Jo Bo Wishing Dolls or that cause confusion or infringe on the recognized rights of Handicraft to this unique and distinguishable trademark and trade-dress.

**ORIGINAL**


### **Motion to Expedite Hearing**

2. Further Handicraft moves this Court for this Court to set an expedited hearing on this motion as well as an expedited schedule for any opposition or reply deemed necessary by this Court. Such expedited hearing measures are necessary to prevent any further injustice or damages.

### **Grounds**

3. As grounds for these motions, Handicraft relies on its Verified Complaint (filed December 1, 2005), which Verified Complaint is incorporated herein by this reference, as well as the supporting exhibits to the Verified Complaint and the attached Memorandum of Points and Authorities.

Respectfully submitted this 12-27-05.



F. MATTHEW SMITH  
Attorney for Plaintiff Saipan Handicraft